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U.S. DISTRICT COURT E.D.N.Y.
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P.M. *[Signature]*
TIME A.M. *[Signature]*

To: Mr. Lois Bloom, Magistrate Judge
U.S Federal Court for EDNY
225 Cadman Plaza East
Brooklyn NY 11201

November 13, 2009

The Court shall schedule an initial conference once defendants respond to the complaint. Discovery is stayed pending the initial conference.
The application is ☒ granted ☐ denied.
SO ORDERED,

/S/

RE: Moore Vs. City of NY et al. case: 08 -CIV-02449(RRM)(LB) Lois Bloom, U.S.M.J.

Dated: 11/20/09
Brooklyn, New York

Dear Judge Bloom,

This is my request to skip/apply the conference under rule 26 (f) and allow me to serve the parties and third parties with interrogatories/written deposition as follows:

1. This is a case pending before this court since June 2008. Based on the order of the court as of 7/28/09 it is unlikely that defendants will be able to come up with a non-frivolous motion to dismiss the amended complaint and therefore all that we are waiting for is that Defendants will please to answer the complaint and deny all the allegation of the complaint.
2. Defendants 3, 4 were granted an extension of time to answer the complaint by 11/13/09 and failed to do so. I requested from the court in a letter dated 10/16/09 to set a pre motion-conference to decide amongst other issues of the eligibility for a judgment by default which has not been adjudicated yet. Assuming that an order

of extension of time will be granted until defendants will please to answer, it will be on the other hand fair and efficient to allow me to start submitting to defendants 3,4 interrogatories/depositions in writing as well to issue interrogatories/deposition in writing to third parties who have relevant information about this case.(Third parties will include Defendants 5,6 who have not answered yet and the time to answer has not expired(11/30/09) and/or they have not been served as of now but they know about the litigation here and are represented by same counsel.)

3. I am entitled to serve such requests without leave of court under the federal rules 31(a)1 and 33 but because I anticipate requests for further extension of time(Which is their only defense) and also objections by respondents to answer, which may further delay the process, I prefer to get leave of court to proceed.
4. Such order of the court will expedite the process and contribute to the fairness and efficiency of the litigation as a matter of due process.

Thank you

Teddy Moore

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